

Exhibit Z

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

ARIANE ROWLAND, and
JAMIE SCHULZE,

Cause No.
CV-20-59-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC., and
WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA,

Defendants.

VIDEO-RECORDED DEPOSITION UPON ORAL EXAMINATION OF
ARIANE ROWLAND

BE IT REMEMBERED, that the video-recorded deposition upon oral examination of ARIANE ROWLAND, appearing at the instance of Defendants Watchtower Bible and Tract Society of New York, Inc., was taken at the offices of Fisher Court Reporting, 2711 1st Avenue North, Billings, Montana, on Tuesday, November 8, 2022, beginning at the hour of 9:16 a.m., pursuant to the Federal Rules of Civil Procedure, before Barbara J. Batts, Registered Merit Reporter, Certified Realtime Reporter, and Notary Public.

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Ariane Rowland

1 A. I was told he's dead.

2 Q. When do you -- when do you have -- when do
3 you recall Mr. Haines sexually abusing you?

4 A. I don't have specific dates. I'd have to
5 say probably between -- between five and, like,
6 nine.

7 Q. Okay.

8 A. Nine or ten.

9 Q. And Mr. Haines, what -- what type of
10 misconduct, criminal misconduct, did Mr. Haines
11 engage in with you?

12 A. You mean, like, what did he do to me?

13 Q. Uh-huh.

14 A. He used to chase me around the house. He
15 used to touch me inappropriately. He would make me
16 touch him. And then his daughters would be
17 involved sometimes.

18 He liked to make me and Jolene do things,
19 and then sometimes he would have sex with Carla in
20 front of us.

21 Q. Okay. Let's unpack it. First you said,
22 "he would chase me around the house." Whose house
23 would he --

24 A. His house.

25 Q. His house. So you would go to the Haines'